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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

October 7, 2005

**Sarah Brown, Treasurer**  
**Ohio State Central & Executive Committee**  
**211 S. Fifth Street**  
**Columbus, OH 43215**

**Response Due Date:**  
**November 7, 2005**

Identification Number: C00162339

**Reference:** June Monthly Report (5/1/05 – 5/31/05)

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

- Schedule A supporting Line 11(a)(i) of your report discloses a receipt from Lynda A. Bachman with the description of "uncashed check," which appears to be a voided or returned check. Please be advised that if a contributor's check is not cashed by your committee, the voided or returned check should be properly disclosed as a negative entry supporting the Line on which the original contribution was reported. Please amend your report to clarify this discrepancy or provide clarification regarding this transaction.
- Your report discloses voided checks totaling \$1,149.44 on Schedule A supporting Line 15 of the Detailed Summary Page. If a check written by your committee was not cashed, you should itemize the voided check as a negative entry supporting the line on which the disbursement was originally reported. Line 15 should be used if the recipient cashed your check and wrote a refund on its account. Please amend your report to correct this discrepancy or provide clarification regarding this transaction.
- Your report discloses a voided check totaling \$2,869.47 on Schedule A supporting Line 15 of the Detailed Summary Page of what appears to be a previously disclosed allocable expense from IKON Financial Services. If

-Your report discloses voided checks totaling \$1,149.44 on Schedule A supporting Line 15 of the Detailed Summary Page. If a check written by your committee was not cashed, you should itemize the voided check as a negative entry supporting the line on which the disbursement was originally reported. Line 15 should be used if the recipient cashed your check and wrote a refund on its account. Please amend your report to correct this discrepancy or provide clarification regarding this transaction.

-Your report discloses a voided check totaling \$2,869.47 on Schedule A supporting Line 15 of the Detailed Summary Page of what appears to be a previously disclosed allocable expense from IKON Financial Services. If

the check written by your committee was not cashed, you should itemize the voided check on Schedule H4 supporting Line 21(a) as a negative entry. Line 15 should be used if the recipient cashed your check and wrote a refund on its account. Please be advised that when a committee voids a check of an allocable expense, it must be allocated between the federal and nonfederal accounts according to the same allocation ratio used to allocate the original disbursement. Furthermore, the federal account must transfer the nonfederal portion to the nonfederal and disclose this transfer-out on Schedule H4. Your report does not appear to disclose a transfer-out of the nonfederal portion of this refund or rebate. Please amend your report to correct this discrepancy or provide clarification regarding this omission.

-Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "chairmans auto lease," "clothing allowance for new staff," "extra keys for Chmns auto," "housing allowance," "staff addl life insurance". Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal election activity or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding this improper allocation activity, your prompt action will be taken into consideration.

-Schedule H4 of your report discloses \$3,000.00 in payments for "minority outreach consulting" to individuals. Please clarify whether these individuals are employees of your committee. You are advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal election activity or activities in connection with a Federal election must not be allocated between or among federal, non-federal and Levin accounts. Rather, only federal funds may be used. Any reimbursement from your committee's non-federal or Levin account for salary and wage payments is not permissible and must be returned. Please provide clarification regarding these payments.

-Schedule H4 discloses payments made to credit card companies for shared federal and non-federal activity. Please be advised that these payments must identify as memo entries, the original vendors from which you have purchased an item or service regardless of the amount. Please amend your report by providing the name and mailing address of the original vendor, along with the date, amount and purpose of each expenditure. 11 CFR §§104.10 and 104.17

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule(s) H4 of your report to clarify the following description(s): "administrative expenses-memo entries don," "office supplies," "office supplies, software, internet," and "on line services" (all of which were paid to individuals). For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H4 of your report discloses a reimbursement(s) to an individual(s) for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by committee staff that make up the reimbursement have to be itemized as memo entries regardless of the amount. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and an adequate purpose. Please amend your report to include the missing information. 11 CFR §§104.10 and 104.17, and Advisory Opinion 1996-20, footnote 3

-Schedule H4 of your report discloses reimbursements to individuals for "expense allowance," "building maintenance supplies," "extra keys for Chmn's auto," "reimburse for shredder," "office supplies," "office supplies, software, internet" and "on line services." Please be advised that when itemizing reimbursements to individuals for goods or services, payment to the original vendors must be itemized as memo entries regardless of amount. Each memo entry must include the name and address of the original vendor, as well as the date, amount and purpose of the original purchase must be provided. Please amend your report to include the missing information. 11 CFR §§104.10 and 104.17, and Advisory Opinions 1992-1 and 1996-20, footnote 3

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated.

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,  
Gaura E. Jinnah

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